
Advanced Wireless Services

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CTIA Presentation

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Flexibility of Spectrum Use

- Carriers in the AWS bands should have the flexibility to offer both fixed and mobile services, or any combination of the two.
- Flexibility in service rules can be factored into auction decisions.
- This type of flexibility, when combined with the other “property-like” rights of exclusivity and transferability, promotes technology neutrality, fosters the development of innovative, state-of-the-art service offerings and creates a strong incentive to put spectrum to its highest valued use.

Regulatory Framework/Technical Rules

- The framework and technical rules set forth in Part 24 will best facilitate flexible use of the AWS bands and ensure that advanced wireless networks and services are rapidly developed and deployed.
 - Part 24 already provides PCS licensees a degree of service flexibility similar to that proposed for the AWS band.
 - Part 24 has a proven track record of encouraging the rapid and widespread deployment of advanced wireless technologies to the American public.
 - Applying the same regulatory framework to both the PCS and AWS bands would avoid imposing disparate regulatory and technical requirements on carriers offering the same or similar advanced wireless services in both bands.

Regulatory Framework/Technical Rules (cont.)

- However, to address the risk of interference with incumbent Government users and between AWS licensees, the use of both mobile and base transmitters in both bands should *not* be allowed.
- Additional Part 101 requirements should not be imposed on licensees offering fixed services in the AWS bands to prevent those licensees from being subject to disparate regulatory treatment.

Spectrum Blocks

- Licenses should be of sufficient bandwidth so as to enable carriers to provide the next generation of “broadband” services.
- The size of the spectrum blocks should help ensure that there are a sufficient number of entry opportunities made available in each geographic area for multiple competitors
- The service rules should provide for several different sized paired spectrum blocks.
 - For example: One 30 MHz block (2x15 paired) and three 20 MHz blocks (2x10 MHz paired)
 - This would ensure that licensees receive a sufficient amount of spectrum to provide advanced wireless services, but would not be forced to acquire more spectrum than is necessary for their operation.

Size of Geographic License Area

- The Commission should license most of the AWS spectrum using a nationwide or regional geographic area approach.
- One license should be reserved for smaller license areas such as MSAs/RSAs.
- A “combination” approach best serves the Commission’s goal of balancing efficiency with the dissemination of licenses among a variety of applicants.
- For example, the FCC could establish one nationwide block (or six regional blocks with combinational bidding), two blocks using 12 REAGs, and one block using 734 cellular market areas (MSAs/RSAs).

Spectrum Aggregation Limits and Eligibility Restrictions

- Given the state of competition in the CMRS market, neither a *a priori* band-specific spectrum aggregation limits nor eligibility restrictions are necessary for the AWS bands.

License Term and Renewal Expectancy

- A 15-year or longer term is appropriate in these bands given the incumbent environment.
- This term, combined with a strong renewal expectancy, will provide investors with the necessary assurances that a sufficient amount of time will be available to recoup the initial costs of clearing the band and developing and deploying advanced wireless networks in the AWS bands.

Regulatory Performance Requirements

- At most, CTIA believes the FCC should adopt a “substantial service” requirement at license renewal.
- Other inflexible performance requirements will impair innovation and unnecessarily limit the types of service offerings licensees can provide.

Partitioning and Disaggregation

- CTIA strongly supports permitting partitioning and disaggregation in the AWS bands.
- This will allow licensees to use spectrum more efficiently, speed service to underserved areas, stimulate competition, and facilitate the acquisition of spectrum by a variety of entities, both large and small.

Competitive Bidding

- The public interest will best be served by licensing all portions of the AWS band through competitive bidding pursuant to section 309(j) of the Commissions Act.
- CTIA also supports pending legislation to change the process by which non-Governmental licensees reimburse U.S. Government users for their relocation costs.